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To Whom It May Concern:

Re: Patent Application 09/476,711 "A Declarative Method for Business Management"

A careful analysis and review of the patent application (Serial Number: 09/476,711) and a thorough examination and re-examination of my book (Hossein Bidgoli, Handbook of Management Information Systems: A Managerial Perspective, Academic Press, San Diego California, 1999) reveals that the invention is not disclosed or obvious by the material presented in this book. The inventor introduces a number of management processes and tools such as business process, business management, hierarchical organization, management by objective, total quality initiative, distributed systems, closed-loop control, AI, expert system and rule-based programming environment that are also discussed in my book. However, the inventor utilizes these tools and techniques in a unique format formulated in the proposed *Declarative Method* and his presentation and formulation do not have any relationships with the materials presented in my book.

Throughout my 24+ years of teaching and publishing more than 120+ books, articles and professional manuals I have not seen a *method* or *model* similar to the one presented by the inventor for business management and to me it is novel and unique.

As outlined above, tools and techniques for managing a business are discussed in numerous literatures. The novelty of this invention is its integration of these various tools and processes into a declarative method that assists a businessperson to manage a business. This integration of tools, concepts and processes were certainly not obvious to me. Its uniqueness and advantages are clearly introduced by the inventor in his proposal.

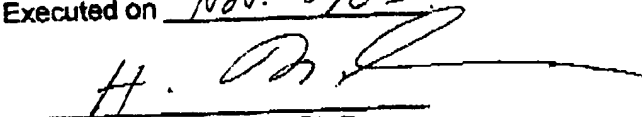
Nothing I have written, read, or was aware of prior to reading the inventor's application suggested that any of the combinations of techniques described in the application might be possible, successful, or both possible and successful. With respect to business management methods I am cognizant of and those fields of expertise which I am knowledgeable about (see my attached curriculum vitae), putting these combinations into effect would be within the ordinary skill of those experienced in each of the appropriate fields after reading the disclosure in the inventor's application. Prior to 12/30/1999 and without that disclosure, I believe that it was not within such ordinary skill.

Each of the necessary concepts, tools, and means of their combination were disclosed to that level of detail necessary for their comprehension and subsequent implementation; those details which are well-known to those with ordinary skill were not described. Those with ordinary skill as described above, upon reading the inventor's application, would appreciate the invention's usefulness. Its advantages were clearly stated.

Should you need additional information regarding this matter, I will be more than happy to provide it to you. A copy of my curriculum vitae is attached.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Nov. 8/03



Hossein Bidgoli, Ph.D.

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